

# EXHIBIT N

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IAN J. BROWN, JAMES BROWN, and  
BARBARA BROWN,

Plaintiffs,

VS

CIVIL ACTION NUMBER:  
04-11924-RGS

UNITED STATES OF AMERICA,  
VERIZON NEW ENGLAND, INC., and  
BOSTON EDISON COMPANY d/b/a NSTAR ELECTRIC,

Defendants.

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**DEPOSITION OF**  
**ARMAND L.C. OUELLETTE**

June 2, 2006  
2:35 p.m.

Hanscom Air Force Base  
20 Schilling Circle  
The Brown Building  
Bedford, Massachusetts

Amanda Stevens, Notary Public and Professional Shorthand Reporter,  
within and for the Commonwealth of Massachusetts.



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1 A. No. I sure don't. It was --  
2 Raytheon used to have a problem with  
3 people running into the fence.

4 Q. And just for the record, you're  
5 pointing to the fence right beyond --

6 A. Right. On the lower plain.

7 Q. Right. Yes.

8 A. All along in there they  
9 (indicating) -- everybody was always  
10 running into it, and somebody finally  
11 decided to put a guardrail there. I don't  
12 know who.

13 Q. Do you know approximately when that  
14 decision was taken to put the guardrail  
15 in?

16 A. They put it in there to protect the  
17 fence after they put the new fence in. I  
18 would say 15, 16 years ago anyways.

19 Q. So that would be approximately  
20 1990?

21 A. Yeah.

22 Q. Okay.

23 A. In that time frame.

24 Q. And at that time, you were serving



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51

1 know who was responsible for replacing the  
2 fence?

3 A. No, I don't.

4 Q. You said it was your understanding  
5 that the guardrail was installed about 14  
6 or 15 years ago --

7 A. Mm-hmm.

8 Q. -- is that right?

9 A. Yes.

10 Q. So that would be about 1990?

11 A. Yes.

12 MR. LEWIN: That's all I  
13 have. Thanks.

14 EXAMINATION

15 BY-MR. CALLAHAN:

16 Q. Mr. Ouellette, my name is Michael  
17 Callahan. I have a few questions.

18 I have seen references to what's  
19 been described as Hanscom Field and  
20 Hanscom Air Force Base.

21 Can you, to your knowledge, tell me  
22 what the difference between those two  
23 locations is?

24 A. Yes. Hanscom Field was the



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